

**MEMO ENDORSED**

February 22, 2023

2023 FEB 23 AM 11:02

United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**RE: Motion to Add New Infringement Information and Evidence of Support,  
Warner Music Group Corp, Affiliates ADK UK, The Orchard Enterprises NY, Inc &  
Ingrooves (Trade Name Displayed)**

**CASE #: 22-CV-6200**

**1. Fed. Rule. Civ. P. 15 (a) Motion to Amend as a Matter of Law.**  
case cited; Amaya v. Roadhouse Brick Oven Pizza, Inc., 285 F.R.D. 251,253 (E.D.N.Y.  
2012)

**2. Fed. Rule. Civ. P. 21**  
case cited; Hernandez v. Sikka, No 17 CV 4792SJFSIL,2019 WL 1232092, (E.D.N.Y.  
2019)

**17 U.S. Code § 501 (a) - Infringement of copyright**

Anyone who violates any of the exclusive rights of the copyright owner as provided by sections 106 through 122 or of the author as provided in section 106A(a) These entities listed have all infringe plaintiff exclusive rights by collecting advertisement, sound recording and mechanical monies.

**Complaint**

Plaintiff disputed 17 songs **January 29, 2023**, on **Youtube LLC** platform in violation of **17 U.S. Code § 501 (a)** exclusive rights of plaintiff copyright has been infringed by **Warner Music Group Corp, ADK UK, The Orchard Enterprises NY Inc and Ingrooves**. Plaintiff 17 songs copyright registration was fraudulently removed on the **YouTube LLC** platform, and these entities falsely claimed ownership rights, claiming advertisement, sound recordings and mechanicals PRO credits see; **SCHEDULE D**

**Fraudulent Removal of Registration Codes**

**Warner Music Group Corp and ADK UK** affiliates of **Warner Music Group Corp** used **Youtube LLC** manual claiming tool and fraudulently claim plaintiff exclusive rights of song titled **Gwaan So (Exhibit A3, B2 & B3 )** and **Flava** video rights (**Exhibit A4**)

**Warner Music Group Corp** infringe on plaintiff exclusive rights when the release **Hit Him Back, Mr Hart Harden & Goody 2 Shoe**. Plaintiff filed a take down and Youtube refused to adhere to the exclusive rights holder request on February 4, 2023. (**Exhibit C3**)

Plaintiff disputed 17 songs registration fraudulently removed on the **YouTube LLC** platform and falsely claimed ownership rights, any advertisement money, sound recordings and mechanicals PRO credits et al. (**Exhibit D**)

**Tunecore Digital Media, Inc.** sister company of **The Orchard Enterprises NY, Inc** is an online distributor for Shane Richards music since 2013 and is responsible for **Youtube LLC** content id and video claims.

Plaintiffs, song registration codes have been removed or deactivated on **Youtube LLC** songs become unlicensed with no compensation to the exclusive rights owner after any dispute with these entities.

#### Sound Recording Switch

**Warner Music Group Corp**, infringe when they claimed plaintiff exclusive rights to **Tell Me (Exhibit A5)** videos.

**Warner Music Group Corp** fraudulently switch plaintiff **Tell Me (Exhibit A1)** sound recording with a song that they license **Big Man Little Yute, Red Rat ft. Goofy - ISRC# GBBZV9701281** on **Youtube LLC** platform a report was filed with **ASCAP** on **02/06/2023** song is not a part of plaintiff production.

Whenever you click on **Tell Me (Exhibit A1)** song titled **Big Man Little Yute, Red Rat ft. Goofy** the rights are diverted means the wrong parties are getting compensated on **Youtube LLC** platform construed as act of infringement done purpose.  
Plaintiff, respectfully requested for the court to intervene in this matter and enforce plaintiff copyright with a court order.

#### Ingrooves Infringement

**Ingrooves** infringe plaintiff exclusive right when they claim ownership of **Sha La La** videos on **Youtube LLC**. (**Exhibit D**)

#### The Orchard Enterprises NY Inc

Evidence to support continued infringement 17 U.S. Code § 501 (a) ownership of plaintiff copyright by **The Orchard Enterprise NY Inc**, refusal to release ownership claims of Shane Richards of **Youtube LLC** channel Shines Production intellectual property. **Youtube LLC**, copyright dispute was filed on **January 29,2023** and dispute was reviewed on **February 23,2023**. (**Exhibit D**)

The Court is in receipt of Defendants' letter requesting a referral to a magistrate judge for a settlement conference and in the alternative, seeking leave to file a motion to dismiss (Dkt. #25) and Plaintiff's letter response, dated February 14, 2023 (Dkt. #27).

The Court is also in receipt of Plaintiff's above filing and its exhibits, dated February 22, 2023 and styled "Motion to Add New Infringement Information and Evidence of Support." The Court will withhold judgment on Plaintiff's February 22, 2023 motion until it has had an opportunity to hear from the parties at the upcoming conference in this matter. Plaintiff should be prepared to tell the Court whether he wishes the Court to construe this filing as an amended complaint at the telephonic conference scheduled for 11:00 a.m. on **March 8, 2023**. As a reminder, the parties can access the conference by calling (888) 363-4749 and entering access code 5123533.

The Clerk of Court is directed to mail a copy of this endorsement to Plaintiff's address of record.

Dated: March 1, 2023  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE